

CTAP letter to FRP Sources regarding P2, Flowcoating, and MACT development

December 14, 1998

Dear Environmental Contact,

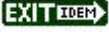
Re: Pollution Prevention Information

This year has been a significant one for changes in environmental regulations for fiberglass reinforced plastic (FRP) product manufacturers. In March, the U.S. Environmental Protection Agency (EPA) removed the AP-42 emission factors for this industry because the factors significantly underestimated emissions from FRP layup facilities. In April, the Indiana Department of Environmental Management (IDEM) met with the Composite Fabricators Association (CFA) and in June, approved the use of their emissions model titled "CFA Emission Models for the Reinforced Plastics Industries" to calculate emissions for air permitting. This model enables a facility to take into account emission reductions from pollution prevention techniques such as flowcoating, vapor suppressed resins, and low styrene resins/gelcoats. With the use of one or more of these techniques, many manufacturers have been able to meet permit limits even with the change in the emission factor. At the same time, manufacturers using these pollution prevention techniques are actually reducing their emissions to the air as well as reducing worker exposure to styrene.

Currently, several new facilities are being required by IDEM to use flowcoaters and low styrene resins and gelcoats. Other manufacturers have begun switching to these and other pollution prevention techniques to meet current limits in their permits or in anticipation of the upcoming National Emission Standards for Hazardous Air Pollutants (NESHAP, aka MACT) for the Reinforced Plastic Composites Industry and also for Boat Manufacturing. Others have found the techniques significantly reduce worker exposure to styrene and assist in meeting the OSHA voluntary styrene limit of 50 ppm. Whatever reason you have for considering the use of these techniques, you are probably looking for more information on the processes, costs, and services available.

Enclosed you will find a **pollution prevention report** from Altec Engineering titled "A Case Study of the Transition from Air Assisted Airless Spray/Chop to Flow Coat/Chop at Altec Engineering." This report is a result of a pollution prevention grant given to Altec in 1997 by IDEM's Office of Pollution Prevention and Technical Assistance to study flowcoating in an actual manufacturing facility rather than a laboratory. The report discusses how Altec chose a flowcoater that satisfied their needs and the pros and cons of flowcoating. It also includes a list of flowcoating suppliers and their contact information. The flowcoat equipment suppliers were each given the opportunity to provide comments on the report. Their written comments are also enclosed as part of the final report.

Also enclosed is an [informative brochure](#) with information on where to get more information on pollution prevention, emission factors, MACT issues, and the upcoming

NESHAPs. One of the most helpful and up-to-date sources of information is a web site from the Pacific Northwest Pollution Prevention Resource Center. This web site is updated monthly and provides information on regulatory MACT updates, pollution prevention technologies, fiberglass scrap recycling, case studies, vendors, and industry expertise. You can link to this site at  www.pprc.org/pprc/sbap/fiber/fiberTOC.html. Another helpful site is IDEM's Compliance and Technical Assistance Program (CTAP) at www.state.in.us/idem/ctap/fiber/information.html. It provides links to information specifically for fiberglassers on air emissions, styrene, special and hazardous waste, OSHA, pollution prevention, and general fiberglass resources.

To further aid the FRP industry, CTAP has contracted with the Clean Manufacturing Technology and Safe Materials Institute to prepare **a manual specifically addressing the FRP industry**. This manual will include regulations from IDEM, OSHA, DOT, and Fire and Building Services. This multi-media manual will be available next year on the internet. Meetings are currently being held in Elkhart to gather information and suggestions from fiberglassers as well as to discuss regulatory issues.

[CTAP](#) will also soon begin meeting with the FRP industry to discuss the development of an **environmental recognition program**. This program will recognize those facilities who go above and beyond environmental regulation requirements. This includes facilities who use pollution prevention options when they are not required to do so. Assistance from the industry in developing this program will be needed.

If you need additional information or confidential compliance assistance or would like to be involved in the creation of the FRP compliance assistance manual and the 5-Star Environmental Recognition Program, please contact me at (800) 988-7901 and ask for extension 3-5555 or (317) 233-5555.

Sincerely,
Karen N. Teliha